



Early Journal Content on JSTOR, Free to Anyone in the World

This article is one of nearly 500,000 scholarly works digitized and made freely available to everyone in the world by JSTOR.

Known as the Early Journal Content, this set of works include research articles, news, letters, and other writings published in more than 200 of the oldest leading academic journals. The works date from the mid-seventeenth to the early twentieth centuries.

We encourage people to read and share the Early Journal Content openly and to tell others that this resource exists. People may post this content online or redistribute in any way for non-commercial purposes.

Read more about Early Journal Content at <http://about.jstor.org/participate-jstor/individuals/early-journal-content>.

JSTOR is a digital library of academic journals, books, and primary source objects. JSTOR helps people discover, use, and build upon a wide range of content through a powerful research and teaching platform, and preserves this content for future generations. JSTOR is part of ITHAKA, a not-for-profit organization that also includes Ithaka S+R and Portico. For more information about JSTOR, please contact support@jstor.org.

This case is interesting as showing to what an extreme length the Nebraska courts have carried the "vice-principal doctrine," a doctrine which has either been repudiated, or much modified in most of the states. Nebraska, however, follows the Ohio doctrine as laid down in *Bena Stone v. Kraft*, 31 Ohio St. 287, which held substantially as above.

GIFTS—CHOSE IN ACTION—DECLARATION OF HUSBAND.—FIRST NATIONAL BANK OF RICHMOND *v.* HOLLAND, 39 S. E. Rep. 126 (Virginia).—A certificate for shares of stock was delivered without indorsement to the defendant by her husband as a gift. The husband's creditors demanded that the stock should be applied to his debts. *Held*, a certificate of stock, a chose in action, is not within the code declaring that no gift of "goods and chattels" shall be valid unless by deed or will, or unless the donee have actual possession.

In many cases stock has been treated as other kinds of personal property and trover sustained, *Maryland Fire Ins. Co. v. Dalrymple*, 25 Md. 242; *Freeman v. Harwood*, 49 Maine 195. Contract for sale of shares is contract for sale of goods within the statute of frauds. *Tisdale v. Harris*, 20 Pick. 9. The court in this case reviews the several sections of the Code in which the words "goods and chattels" are found, and declares that these terms in every instance are limited in meaning to corporal personal property.

Giving the words "goods and chattels" in the section in controversy the same construction, the court holds that choses in action are not included. A similar decision is found in *Kirkland v. Brune*, 31 Grat 126.

INSANE FELLOW SERVANT—PRESUMPTION.—ATKINSON *v.* CLARK, 64 Pac. 769 (Calif.).—Plaintiff was injured while tearing down some walls at a state asylum for the insane on which some of the inmates were working. There was no negligence on the part of the asylum officials in selecting the inmates who were put on such jobs. *Held*, there can be no presumption that the inmates were dangerous and unskillful from the fact alone that they were insane.

Apparently there is no case in point. The decision would appear to be a correct one, however. There are undoubtedly numerous forms of insanity in which the afflicted persons fully retains the skill of his hands and an ordinary realization of common dangers. Arguing from the standpoint of custom and usage it may be said that in a great many of our large state insane asylums in this country the labor of the inmates figures as an important factor in the maintenance of the premises and the performance of various menial duties.

LIKENESSES—USE FOR ADVERTISING—RIGHT OF PRIVACY.—ROBERSON *v.* ROCHESTER FOLDING BOX CO. ET AL., 71 N. Y. Supp. 876.—Defendants without authority published and circulated lithographic prints of plaintiff with advertisements of their business thereon. Plaintiff was hereby made the subject of scoffs and jeers, causing her humiliation and sickness. *Held*, to be an invasion of her right of privacy for which she might maintain action to restrain publication and for damages.

This decision is another forward step on the part of the courts in establishing and protecting the right of privacy. The theory upon which the action